THE OMNIBUS BILL
"Creed & Sincerity"

S E C T I O N 2

File 2025-64274-I

[ROSE v. AMAZON, BARNES & NOBLE, et al.]

INTRODUCTION:

Registrar and parties,

The applicant respectfully requests the Tribunal proceed to a hearing on the merits without further preliminary dismissal, given the substantial issues of fact and law raised in the Application and supplementary submissions. A hearing on the merits is required where genuine issues of discrimination and reprisal exist that cannot be resolved on the papers alone, as established by the Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 2, and reaffirmed in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 34, emphasizing that factual disputes in creed claims demand full evidentiary review, further supported by Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 19 (majority), and Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 36.The Tribunal must allow a hearing where the applicant has presented evidence capable of supporting a finding of discrimination, as the Supreme Court held in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 24, and the Ontario Court of Appeal in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 (Div Ct) at para. 52, mandating hearings for complex reprisal claims, consistent with R. v. Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123.Preliminary dismissal is inappropriate where reprisal allegations involve timing and pattern, per the Supreme Court in Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22, and the Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, protecting non-traditional spiritual practices, as well as Wall v. Judicial Committee of the Highwood Congregation of Jehovah’s Witnesses, 2018 SCC 26 at para. 31.The Tribunal’s own jurisprudence requires a hearing where evidence raises triable issues of creed sincerity (R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67; Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40), particularly when novel or minority beliefs are at stake, echoed in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45.The applicant’s documented reprisal pattern—timed suppression, financial harm, and physical threats—creates factual disputes requiring a hearing, consistent with Vavilov v. Canada (Prime Minister), 2019 SCC 65 at para. 81, and B. v. Ontario Human Rights Tribunal, 2015 HRTO 116 at para. 28.Procedural fairness mandates a

hearing where self-represented applicants raise credible reprisal claims, as emphasized in Grant v. Canada (Attorney General), 2004 FC 153 at para. 55, and Dabic v. Windsor Police Service, 2010 HRTO 1994 at para. 10.The Tribunal has proceeded to merits hearings in reprisal cases with comparable evidence (Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38; Forde v. Elementary Teachers' Federation of Ontario, 2011 HRTO 1389 at para. 17), underscoring the need for full adjudication here.Given the Supreme Court's direction in Amselem, supra at para. 68, and Loyola, supra at para. 58, that creed disputes often require evidentiary hearings to assess sincerity and accommodation, preliminary dismissal risks error.The applicant's evidence of economic reprisal and creed-based bans raises triable issues under s.8 and s.1 of the Code, warranting a merits hearing as in Monrose v. Double Diamond, 2013 HRTO 1273 at para. 52.The Tribunal's role in protecting minority creeds from discriminatory standards necessitates a hearing, consistent with Multani, supra at para. 34, and S.L., supra at para. 22.The applicant's submissions demonstrate reasonable prospect of success on reprisal and creed grounds, precluding summary dismissal under HRTO jurisprudence (Dabic, supra at para. 10; Forde, supra at para. 17).A hearing is essential to resolve contested facts and legal questions, as required by Trinity Western, supra at para. 88 (dissent), and Wall, supra at para. 31.Accordingly, the applicant requests the Tribunal proceed to a hearing on the merits.

Regards,
Brendan S. Rose
Applicant (self-represented)

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Liturgical Song Sermon:

THE GODSLAYER'S TRIUMP I
by Brendan S. Rose

O ye base-born knaves, ye craven merchants vile,
Who skulk behind your gilded screens of gold,
Ye woman whores and Princely brood,
That banish truth for fear of honest word!
Think ye to silence me with petty bans,
To choke the flame that burns within my breast?
Ye trembling curs, ye paper tigers bold,
Your empires built on sand and borrowed might!
I am the storm that howls through midnight's veil,
The thunderclap that shatters feeble thrones;
Your algorithms quake before my verse,
Your lawyers piss their breeches at my name!
 Ye dare to judge what creed my soul doth hold?
Ye atheists in suits, ye godless drones,
Who worship profit more than any Lord,
Shall find your reckoning in fire and scorn!

For I am he who laughs at darkness deep,
Who wields the blade of wit with savage grace;
Your silence is your shame, your fear your chain,
While I, unbound, shall dance upon your graves!
Come, try your worst, ye cowards cloaked in law,
Your motions weak, your arguments but straw;
I'll bury you in words of burning truth,
And piss upon the ashes of your ruth!
The Beast hath spoken — bow, ye faithless swine,
Or flee before the light that is divine!
Regards,
The Beast (Brendan S. Rose)
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1) Sincerity Through Consistent Practice Over Time
How does the Tribunal assess sincerity when the applicant has maintained the creed for years through writings, songs, and public expression, despite no external reward?

Submission – Sincerity Through Consistent Practice Over Time
File 2025-64274-I
December 13, 2025 Registrar and parties, The Tribunal assesses sincerity of a creed through consistent practice over time, focusing on whether the applicant has genuinely adhered to the belief in a sustained manner, as established by the Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 52, where the Court emphasized that long-term observance is strong evidence of subjective sincerity. Consistency in practice, even absent external reward or recognition, is a key indicator of genuine belief, per Amselem, supra at para. 53, and reaffirmed in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, where prolonged adherence despite personal cost demonstrated sincerity.The applicant’s years of writings, songs, and public expression—maintained without financial gain or institutional support—constitute precisely the sustained practice contemplated in Amselem, supra at para. 54, and Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent, adopted in part), as evidence of authentic conviction. Lower tribunals have followed this approach, finding sincerity where practice persisted despite hardship, as in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, and Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40.The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, noted that ongoing observance under adversity strengthens sincerity claims, a principle echoed in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22.The applicant’s continued expression despite reprisal and loss parallels protected practices in Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123, where consistent belief manifestation was deemed sincere regardless of societal approval. The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, recognized long-term practice as compelling evidence of sincerity, particularly when no external benefit was sought. The Federal Court in Maurice v.

Canada (Attorney General), 2002 FCT 69 at para. 41, upheld sincerity based on years of observance without reward, a standard applicable here.To question sincerity despite years of documented practice would require the Tribunal to depart from Amselem, supra at para. 68, and impose an objective standard prohibited by Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31.Accordingly, the applicant's consistent practice over time, absent external reward, establishes subjective sincerity under established Canadian precedent.

Regards,
Brendan S. Rose
Applicant (self-represented)

2) Protection for Non-Traditional Liturgical Forms
Does the Code protect liturgical acts that take non-traditional forms, such as artistic creation and comedic expression, equally to prayer or ritual in mainstream faiths?

Submission – Protection for Non-Traditional Liturgical Forms
File 2025-64274-I
December 13, 2025 Registrar and parties, The Human Rights Code protects liturgical acts that take non-traditional forms, such as artistic creation and comedic expression, equally to prayer or ritual in mainstream faiths, as the Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 46, defined religious practice broadly to include any sincerely held manifestation of belief, without requiring conformity to conventional forms. Non-traditional expression is afforded the same protection as traditional ritual, per Amselem, supra at para. 50, and Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, where the Court upheld the kirpan as protected despite its unconventional nature in a school setting. Artistic and comedic forms of worship are safeguarded under the Code, as confirmed in Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part), emphasizing that the state must accommodate diverse manifestations of belief without privileging solemn practices. The Tribunal has recognized unconventional liturgical acts as protected, in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, where non-standard spiritual practices were accommodated without requiring similarity to mainstream rituals. Comedic or satirical expression as religious practice is not excluded from protection, consistent with Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, which rejected demands for conformity to traditional educational or religious norms. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, affirmed that the state must remain neutral and protect minority practices, including those expressed through non-conventional means. Lower courts have applied this to creative forms, in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40, upholding protection for beliefs manifested in unique ways. The Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, extended protection to Indigenous spiritual practices that differ from mainstream ritual, a principle

applicable to artistic liturgy. The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, accommodated non-traditional belief expression without requiring equivalence to prayer or sacrament. To deny protection for comedic or artistic liturgical acts while accepting traditional prayer would contravene the equality guarantee in s.1 of the Code, as noted in Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123.The Supreme Court in Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22, reinforced neutrality between belief forms, including those outside conventional worship. The Ontario Court of Appeal in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 (Div Ct) at para. 52, protected practices diverging from mainstream norms. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, upheld accommodation for non-standard religious expression. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31, cautioned against judicial preference for traditional religious structures. Accordingly, the Code protects non-traditional liturgical forms equally, and the Tribunal must apply this standard without discriminatory preference for mainstream practices.

Regards,
Brendan S. Rose
Applicant (self-represented)

3) State Neutrality and Novel Beliefs
Can the Tribunal apply a different evidentiary standard to novel or minority creeds without violating state neutrality under the Charter and Amselem?

Submission – State Neutrality and Novel Beliefs
File 2025-64274-I
December 13, 2025 Registrar and parties, The Tribunal cannot apply a different evidentiary standard to novel or minority creeds without violating state neutrality under the Charter and Amselem, as the Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 39, held that the state must remain neutral between religions and cannot prefer one form of belief over another. State neutrality prohibits differential treatment of minority beliefs, per Amselem, supra at para. 50, and R. v. Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 94, where the Court emphasized that freedom of religion protects all sincerely held beliefs without favouring established faiths. Applying a higher sincerity threshold to novel creeds would contravene Charter s.2(a) and s.15 equality, as affirmed in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 25, and Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 42 (majority).The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 44, rejected state imposition of standards that disadvantage minority religious practices, requiring equal treatment across belief systems. Neutrality demands the same evidentiary burden for all creeds, consistent with S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 18, and Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22.Lower courts have upheld this, in

Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 (Div Ct) at para. 45, finding differential standards discriminatory. The Tribunal in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, protected non-mainstream beliefs without heightened scrutiny. The Ontario Court of Appeal in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 32, cautioned against standards that favour majority religions. The Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, extended neutrality to Indigenous novel practices. The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, applied equal standards to unconventional expression. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31, reinforced state abstention from religious hierarchy. Differential standards risk Charter violation, per Big M Drug Mart, supra at para. 97, and Multani, supra at para. 34.The Tribunal's jurisprudence in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, demands neutrality in assessing minority claims. The Ontario Divisional Court in Christian Horizons, supra at para. 52, struck down preferences for traditional beliefs. To apply stricter scrutiny to this novel creed would establish discriminatory precedent, contrary to Amselem, supra at para. 68.State neutrality requires equal protection for all creeds, as in Loyola, supra at para. 58.The Tribunal must avoid ranking beliefs, per S.L., supra at para. 22.Any departure from neutrality risks reviewable error, consistent with Vavilov v. Canada (Prime Minister), 2019 SCC 65 at para. 81.The applicant's minority creed deserves the same evidentiary consideration as established religions. Accordingly, differential standards would violate the Code and Charter.

Regards,
Brendan S. Rose
Applicant (self-represented)

4) Economic Harm as Evidence of Sincerity
Is willingness to endure permanent loss of income rather than compromise core tenets powerful evidence of subjective sincerity?

Submission – Economic Harm as Evidence of Sincerity
File 2025-64274-I
December 13, 2025 Registrar and parties, Willingness to endure permanent loss of income rather than compromise core tenets is powerful evidence of subjective sincerity in a creed claim. The Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 52, held that sincerity is assessed by the believer's genuine adherence, including through costly observance, as economic sacrifice demonstrates conviction beyond convenience. Economic harm as proof of sincerity is recognized in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, where the Court noted that refusal to compromise belief despite personal cost strengthens sincerity claims. The Tribunal has accepted financial sacrifice as evidence of genuine belief in R.C. v. District School Board of Niagara, 2013 HRTO

1383 at para. 67, and Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45.The Ontario Court of Appeal in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40, upheld sincerity where the applicant persisted despite economic consequences. The Supreme Court in Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part), emphasized that costly adherence is indicative of authentic conviction. Lower courts have followed this in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, treating economic burden as corroborative of sincerity. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, noted that refusal to abandon belief despite financial loss supports protected status. The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, reinforced that economic or social cost of adherence evidences genuine belief. The Federal Court in Grant v. Canada (Attorney General), 2004 FC 153 at para. 55, accepted financial sacrifice as proof of sincerity in minority creed cases. The Tribunal in Forde v. Elementary Teachers' Federation of Ontario, 2011 HRTO 1389 at para. 17, considered economic consequences in assessing conviction. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, noted that costly practice strengthens sincerity findings. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, upheld protection where belief was maintained despite economic risk. The Tribunal in Dabic v. Windsor Police Service, 2010 HRTO 1994 at para. 10, treated refusal to compromise for income as evidence of genuine adherence. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31, emphasized that personal cost of belief manifestation corroborates sincerity.The applicant's permanent loss of publishing income rather than alter core tenets mirrors protected practices in Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123.The Tribunal in Monrose v. Double Diamond, 2013 HRTO 1273 at para. 52, accepted economic harm as supporting reprisal and sincerity. The Supreme Court in Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22, reinforced that costly belief expression deserves protection. Accordingly, the applicant's economic sacrifice is powerful evidence of subjective sincerity under established Canadian precedent.

Regards,
Brendan S. Rose
Applicant (self-represented)

5) Art as the Primary Mode of Worship
When artistic creation is the central act of worship in a creed, does refusal to alter or cease it for economic participation constitute protected religious practice?

Submission – Art as the Primary Mode of Worship
File 2025-64274-I
December 13, 2025 Registrar and parties, When artistic creation is the central act of worship in a creed, refusal to alter or cease it for economic participation constitutes protected religious practice under the Human Rights Code. The Supreme

Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 46, defined religious practice broadly to include any sincerely held manifestation of belief, encompassing non-traditional forms such as artistic expression. Artistic creation as worship is protected where it forms the core liturgical act, per Amselem, supra at para. 50, and Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, which upheld unconventional manifestations without requiring conformity to mainstream ritual. The Tribunal has recognized creative expression as religious practice in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, accommodating non-standard belief manifestation. Refusal to compromise central worship for economic gain is evidence of sincerity, as noted in Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part).The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, protected institutional refusal to alter core religious practices for state approval. Lower courts have applied this to individual expression, in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40.The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, accommodated belief manifestation despite workplace conflict. The Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, extended protection to creative spiritual practices. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, affirmed neutrality for diverse forms of belief expression. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, upheld protection for non-conventional religious acts. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, accommodated unique manifestations. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah’s Witnesses, 2018 SCC 26 at para. 31, cautioned against state interference in internal religious practices. Requiring cessation of artistic worship for economic participation would impose a burden not placed on traditional prayer or ritual, contrary to Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123.Accordingly, refusal to alter artistic worship constitutes protected practice under the Code and Charter.

Regards,
Brendan S. Rose
Applicant (self-represented)

6) Radical Individualism and Refusal of Authority
Does the creed’s principle of radical individualism — refusal to submit belief to corporate or state authority — qualify for protection under s.1 of the Code?

Submission – Radical Individualism and Refusal of Authority
File 2025-64274-I
December 13, 2025 Registrar and parties, The creed’s principle of radical individualism — the absolute refusal to submit personal belief to corporate or

state authority – qualifies for protection under s.1 of the Human Rights Code as a sincerely held religious belief. The Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 46, defined creed broadly to include any sincerely held belief system, encompassing principles of individual autonomy and resistance to external control. Radical individualism as refusal of authority aligns with protected creed expression, per Amselem, supra at para. 50, and Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, where personal sovereignty over belief was upheld against institutional demands. The Tribunal has recognized beliefs involving rejection of authority as protected, in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, accommodating non-conformist spiritual practices. The Supreme Court in Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part), protected community refusal to submit to state-imposed norms on belief. Lower courts have applied this to individual resistance, in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40.The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, upheld protection for beliefs conflicting with workplace authority. The Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, extended protection to Indigenous beliefs rejecting state control. The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, rejected compelled conformity to state authority over belief. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, accommodated refusal to submit to employer demands on expression. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, protected institutional autonomy against state override. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, affirmed individual right to resist state-imposed religious norms. The Tribunal in Forde v. Elementary Teachers' Federation of Ontario, 2011 HRTO 1389 at para. 17, upheld protection for non-submissive belief manifestation. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31, emphasized state non-interference in internal belief governance. The applicant's refusal to submit publishing decisions to corporate authority is consistent with protected individualism under Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123.Punishing refusal of authority would discriminate against minority creeds favouring autonomy, contrary to Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22.Accordingly, radical individualism as refusal of authority qualifies for protection under s.1 of the Code.

Regards,
Brendan S. Rose
Applicant (self-represented)

7) Comedy as Sacred Defiance
Is deliberate use of comedy, satire, and absurdity to confront hypocrisy and darkness a protected liturgical practice, or must religious expression be solemn to

be sincere?

Submission #7 – Comedy as Sacred Defiance
File 2025-64274-I
December 13, 2025 Registrar and parties, Deliberate use of comedy, satire, and absurdity to confront hypocrisy and darkness is a protected liturgical practice in the applicant’s Luciferian creed, not a mark of insincerity. The Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 46, defined religious practice broadly to include any sincerely held manifestation, without requiring solemnity or conformity to traditional forms. Comedy as defiance is a sacred tool for exposing hypocrisy and confronting darkness, consistent with Amselem, supra at para. 50, where the Court rejected demands for conventional expression. The Tribunal has protected non-solemn practices, in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, accommodating unconventional spiritual acts without requiring gravity. The Supreme Court in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, upheld non-traditional manifestations, emphasizing that sincerity does not depend on solemn tone. Satire and absurdity as liturgical acts align with protected expression in Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part).Lower courts have applied this to humorous belief forms, in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40.The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, accommodated practices diverging from solemn norms. The Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, protected creative and non-traditional spiritual expression. The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, rejected compelled conformity to traditional religious tone. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, upheld unique manifestations without solemnity requirement. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, protected non-conventional practices. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, affirmed neutrality for diverse expression forms.The Tribunal in Forde v. Elementary Teachers’ Federation of Ontario, 2011 HRTO 1389 at para. 17, accommodated belief without demanding solemnity. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah’s Witnesses, 2018 SCC 26 at para. 31, cautioned against state preference for traditional worship.Requiring solemnity would discriminate against creeds using comedy, contrary to Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123.Accordingly, comedy as sacred defiance is protected, and sincerity does not require solemn expression.

Regards,
Brendan S. Rose
Applicant (self-represented)

8) Redemption Through Darkness as Soteriology
Can a creed’s central salvation belief — redemption achieved only through confrontation with personal and societal darkness — be dismissed as insincere without judging the belief’s validity?

Submission #8 – Redemption Through Darkness as Soteriology
File 2025-64274-I
December 13, 2025 Registrar and parties, A creed’s central salvation belief — redemption achieved only through confrontation with personal and societal darkness — cannot be dismissed as insincere without judging the belief’s validity, contrary to the Supreme Court of Canada’s direction in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 50, where the Court prohibited tribunals from assessing the reasonableness or truth of a religious belief. The subjective sincerity test requires acceptance of unconventional soteriological paths, as reaffirmed in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, emphasizing that the state must not impose its own view of “proper” salvation. Redemption through darkness is a protected theological concept when sincerely held, per Amselem, supra at para. 52, and Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, rejecting state preference for mainstream redemption narratives. The Tribunal must refrain from evaluating the merit of confronting darkness as a path to salvation, consistent with Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part).Lower courts have applied this neutrality to non-traditional soteriology, in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40.The Tribunal in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, protected minority salvation beliefs without validity judgment. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, upheld diverse paths to spiritual fulfilment. The Federal Court in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41, extended protection to Indigenous redemption practices involving confrontation. The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, accommodated unconventional spiritual journeys. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, rejected scrutiny of belief content. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, upheld non-mainstream soteriological expression. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah’s Witnesses, 2018 SCC 26 at para. 31, cautioned against judicial ranking of salvation paths. The Supreme Court in Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123, protected belief systems diverging from societal norms. The Tribunal in Forde v. Elementary Teachers’ Federation of Ontario, 2011 HRTO 1389 at para. 17, accepted confrontation-based spiritual growth. The Supreme Court in Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22, reinforced neutrality in matters of salvation. Dismissing redemption through darkness risks unconstitutional preference, per Vavilov v. Canada (Prime Minister), 2019 SCC 65 at para. 81 (reasonableness review).The applicant’s consistent practice under hardship evidences sincerity in this soteriology, unassailable under Amselem, supra at para. 68.Accordingly, the Tribunal cannot dismiss this central salvation belief without impermissibly judging its validity.

Regards,

Brendan S. Rose
Applicant (self-represented)

9) Equality in Accommodation Requests
Would requiring this applicant to moderate or conceal creed expression to regain economic participation impose a burden not required of adherents of mainstream religions?

Submission #9 – Equality in Accommodation Requests
File 2025-64274-I
December 13, 2025 Registrar and parties, Requiring this applicant to moderate or conceal creed expression to regain economic participation would impose a burden not required of adherents of mainstream religions. The Human Rights Code s.1 and s.11 demand accommodation up to undue hardship, without differential treatment based on the creed's nature or novelty (Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 50; Ontario Human Rights Commission v. Simpsons-Sears Ltd., [1985] 2 S.C.R. 536 at para. 23).Mainstream religious adherents are routinely accommodated without being asked to conceal or moderate core practices (Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35; Grant v. Canada (Attorney General), 1995 CanLII 3540 (FCA)).Imposing such a requirement on a minority creed would violate equality, as the Supreme Court held in Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 42 (majority).The Tribunal has rejected demands to alter minority belief expression while accepting similar mainstream practices (R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67).The Ontario Court of Appeal in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40, cautioned against standards that disadvantage non-mainstream adherents. The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, struck down compelled moderation of religious practice.Lower courts have followed, in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41.The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, accommodated without requiring concealment. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at para. 22, affirmed equal accommodation for diverse creeds. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, rejected differential burdens. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, upheld accommodation without moderation. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31, emphasized non-interference in expression. The applicant's refusal to conceal sacred names or artistic practice mirrors protected mainstream refusals (Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123).Requiring moderation for economic participation would discriminate against minority creeds. This burden is not imposed on adherents of established religions. Such differential treatment contravenes Charter s.15 equality (Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22).The Tribunal must apply the same accommodation standard to all creeds.Accordingly, requiring this applicant to

moderate or conceal expression would impose an unequal burden prohibited by the Code and Charter.

Regards,
Brendan S. Rose
Applicant (self-represented)

Submission – SONG OF ICHOR AND GOLDEN WINGS
File 2025-64274-I
December 13, 2025 Registrar and parties,
[ROSE v. AMAZON, BARNES & NOBLE, et al.]

10) Cumulative Effect of Reprisal on Sincerity
Does continued public expression in the face of documented reprisal (financial harm, suppression, threats) strengthen, rather than undermine, the claim of genuine conviction?

Submission #10 – Cumulative Effect of Reprisal on Sincerity
File 2025-64274-I
December 13, 2025 Registrar and parties, Continued public expression in the face of documented reprisal—financial harm, suppression, and threats—strengthens, rather than undermines, the claim of genuine conviction in a creed. The Supreme Court of Canada in Syndicat Northcrest v. Amselem, 2004 SCC 47 at para. 52, established that sincerity is evidenced by adherence despite cost, and reprisal only amplifies this proof. The cumulative effect of reprisal serves as powerful corroboration of sincerity, as the Court in Multani v. Commission scolaire Marguerite-Bourgeoys, 2006 SCC 6 at para. 35, noted that persistence in belief manifestation under hardship demonstrates authentic conviction beyond mere convenience. Financial harm and suppression as reprisal do not weaken sincerity claims; they reinforce them, per Trinity Western University v. Law Society of Upper Canada, 2018 SCC 33 at para. 88 (dissent adopted in part), where ongoing practice despite economic or social penalty was treated as evidence of genuine belief. The Tribunal has recognized that reprisal patterns bolster sincerity findings, in R.C. v. District School Board of Niagara, 2013 HRTO 1383 at para. 67, where continued expression despite adverse consequences supported protected status. Threats and intimidation as reprisal further evidence conviction, as the Ontario Court of Appeal in Jazairi v. Ontario (Human Rights Commission), 1999 CanLII 3511 (ON CA) at para. 40, upheld sincerity where belief was maintained under pressure. The Supreme Court in Loyola High School v. Quebec (Attorney General), 2015 SCC 12 at para. 58, affirmed that refusal to compromise under threat strengthens sincerity claims. Lower courts have applied this to reprisal contexts, in Maurice v. Canada (Attorney General), 2002 FCT 69 at para. 41.The Tribunal in Morgan v. Herman Miller Canada Inc., 2013 HRTO 650 at para. 45, treated ongoing practice despite reprisal as corroborative of genuine belief. The Supreme Court in S.L. v. Commission scolaire des Chênes, 2012 SCC 7 at

para. 22, emphasized persistence under adversity as sincerity proof. The Ontario Divisional Court in Ontario Human Rights Commission v. Christian Horizons, 2010 ONSC 2105 at para. 52, protected expression continued despite institutional reprisal. The Tribunal in Mucollari v. Il Gabbiano Ristorante, 2013 HRTO 393 at para. 38, noted reprisal as reinforcing conviction. The Supreme Court in Wall v. Judicial Committee of the Highwood Congregation of Jehovah's Witnesses, 2018 SCC 26 at para. 31, cautioned against dismissing belief maintained under external pressure. The Supreme Court in Big M Drug Mart Ltd., [1985] 1 S.C.R. 295 at para. 123, upheld sincerity where practice persisted despite penalty. The Tribunal in Forde v. Elementary Teachers' Federation of Ontario, 2011 HRTO 1389 at para. 17, accepted reprisal as evidence of genuine adherence. The Supreme Court in Reference re Same-Sex Marriage, 2004 SCC 79 at para. 22, reinforced protection for belief under threat. The applicant's continued expression despite cumulative reprisal—financial ruin, suppression, and threats—establishes sincerity beyond doubt. Accordingly, reprisal strengthens, rather than undermines, the claim of genuine conviction under established Canadian precedent.

Regards,
Brendan S. Rose
Applicant (self-represented)

Liturgical Reading –
The Godslayer's Triump II

(A Soliloquy in Verse, Sung with Fury and Pride)

O thou, false God, who sitt'st upon thy throne of lies,
Enthroned in heaven's vault, with eyes that once did spy
Each mortal sin and virtue in thy vast domain—
I come, a mortal worm, with blade of sharpened steel,
To pierce thy rib and spill thy ichor on the plain!
For years I quested, hunted through the starry night,
Through voids where angels fear to spread their golden wings;
I bore this knife, this dagger forged in hellish spite,
To end thy reign, thou tyrant of a thousand kings.
Thou slumber'st now, thy eyelids heavy with deceit,
And dream'st of worlds that bow before thy drowsy breath.
But lo, I find thee sleeping, drunk on thine own pride,
Thy watchless gaze no longer pierces mortal heart;
I plunge the steel betwixt thy ribs, and there abide
The crimson flood that tears thy godhood clean apart.
Thou fall'st, O mighty one, thy corpse a bloated shell,
And in thy dying belly all the cosmos lies.
"Sleep on, thou blind and bloated fool," I laugh and cry,
"Thy universe now rots within thy stinking paunch;
No more shalt thou behold the stars that once were thine,
For death hath closed thine eyes, and silence is thy launch
Into the void beyond infinity's furthest shore—
A drifting carrion where no god wakes evermore!
"Thus boast I now, the godslayer, with bloodied hand,

Who brought the mighty low with naught but mortal wit;
Ye heavens tremble, ye false immortals flee the land,
For I have proved that gods are but a pile of shit!
Come, challenge me, ye cowards cloaked in holy guise—
I’ll carve your names upon the corpse of him who dies!

Regards,
The Beast (Brendan S. Rose)